



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

5178

NOV 21 2003

Mr. Glenn Griffiths  
United States Department of Energy  
Fernald Area Office  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

REPLY TO THE ATTENTION OF

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FILE:

2003 NOV 26 A 10:46

ERNA  
LOG E-0194

Subject: Revised Silo 3 Remedial Design / Remedial Action Package

Dear Mr. Griffiths:

The United States Environmental Protection Agency (EPA) received the above-referenced document (RD/RA Package), dated October 3, 2003, on October 6, 2003. The RD/RA Package replaces the previously submitted Remedial Design Package and is intended to meet the requirement for a Remedial Action Work Plan for the Silo 3 Project.

The RD/RA Package does not specify how long it will take to: load the cargo containers; and remove the loaded cargo containers from the site. Also, the disposal facility for Silo 3 material is not indicated, and the means of transporting the loaded containers is not described. While a subsequent separate Silo 3 Transportation and Disposal Plan should clarify these issues, the RD/RA Package should be revised to include this information especially if the disposal site has already been determined. Therefore, EPA disapproves the RD/RA Package; EPA's general and specific comments are enclosed. If you have any questions or concerns, please contact me at (312) 886-4591.

Sincerely,

Gene Jablonowski  
Project Manager  
Federal Facilities Section  
Superfund Division

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Johnny Reising, U.S. DOE-Fernald  
Sally Robison, U.S. DOE-HDQ  
Jamie Jameson, Fluor Fernald  
Terry Hagen, Fluor Fernald  
Tim Poff, Fluor Fernald

ENCLOSURE

TECHNICAL REVIEW COMMENTS ON  
"REVISED SILO 3 REMEDIAL DESIGN/REMEDIAL ACTION PACKAGE"

FERNALD CLOSURE PROJECT

(Three Pages)

**Attachment to:**

E-0194

TECHNICAL REVIEW COMMENTS ON  
"REVISED SILO 3 REMEDIAL DESIGN/REMEDIAL ACTION PACKAGE"

FERNALD CLOSURE PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA                      Commentor: Jablonowski

Section #: Not Applicable (NA) Page #: NA              Line #: NA

Original General Comment #: 1

Comment: The process vent system (system 19) described in Section 4.0 of the process control plan will use a number of manual dampers to control air flow. The system will basically rely on the operator to make most of the air flow adjustments. Typically, in a system where specific pressures must be maintained, it is difficult to control the air flow with manually operated dampers and constant-speed fans. Because the pressure drops across air filters in the process vent system will change because of increased filter loading (clogging), humidity fluctuations, and varying inflow rates, it may be very difficult (or impossible) to maintain control over the air flow rates. The text does not state how these flow rates will be measured or adjusted. The document should be revised to discuss this issue.

Commenting Organization: U.S. EPA                      Commentor: Jablonowski

Section #: NA                      Page #: NA              Line #: NA

Original General Comment #: 2

Comment: The text does not specify how long it will take to (1) load the cargo containers and (2) remove the loaded cargo containers from the site. Also, the disposal facility for Silo 3 material is not indicated, and the means of transporting the loaded containers is not described. While a subsequent separate Silo 3 Transportation and Disposal Plan should clarify these issues, the text should be revised to include this information especially if the disposal site has already been determined.

Commenting Organization: U.S. EPA                      Commentor: Jablonowski

Section #: NA                      Page #: NA              Line #: NA

Original General Comment #: 3

Comment: The text does not address the possibility of the loaded bulk bags being damaged during loading, transport, or unloading. If these bags will be transported by truck, their contents could be spilled on the roadway during an accident. The text should be revised to address this issue.

Commenting Organization: U.S. EPA Commentor: Jablonowski

Section #: 5.3 of Process Control Plan for Silo 3 Project

Page #: 5-4 Line #: NA

Original General Comment #: 4

Comment: The text states that "for each full container, the control system archives a unique identifier (UNID), time and date of filling, weight data, and analytical data (if any)." This statement implies that the bags must be stored somewhere until the analytical data is available. It is not clear how long the bags will have to be stored. Also, the text states that bags will be labeled after being transported to the Cargo Container Bay (see Section 3.7 of the process description for Silo 3 project); however, the text does not state whether this labeling will be done before or after analytical data is obtained. Additionally, Section 3.7 of the process description for the Silo 3 project does not state whether the labels will include the analytical data. The text should be revised to clearly state when the stored bags will be moved. Also, the text should be revised to clarify whether analytical data will be included on the bags' labels.

#### SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Jablonowski

Section #: 2.1.4 of Process Description for Silo 3 Project

Page #: 2-2 Line #: NA

Original Specific Comment #: 1

Comment: In the paragraph labeled "Supply High Efficiency Particulate Air Filter (HEPA)," the last sentence states that "the filter also supplies sweep air to the Fines Collection Bins." It is not clear how an air filter can supply air. Typically, fans or blowers supply air. Air can also be supplied by gravity, provided that a powered exhaust is present. Air filters only remove particulates from an air stream. The text should be revised to clarify this matter.

Commenting Organization: U.S. EPA Commentor: Jablonowski

Section #: 3.1.1 of Access and Retrieval Strategy for Silo 3 Project

Page #: 9 Line #: NA

Original Specific Comment #: 2

Comment: In the last bullet, the text indicates that tape will be applied to seal openings and secure wands to flexible boots. The type of tape to be used, however, is not specified. Typically, pipes or conduits installed through flexible boots are sealed using clamps, and the openings in the flexible boots are sized to accommodate the pipes or conduits that will be installed. Use of tape in this type of installation would be unusual. The text should be revised to address this issue.

Commenting Organization: U.S. EPA Commentor: Jablonowski

Section #: 3.2 of Access and Retrieval Strategy for Silo 3 Project

Page #: 11 Line #: NA

Original Specific Comment #: 3

Comment: The text states that two or more operators will operate the VWMS on the silo dome and that their activities will be guided by VWMS cameras and through radio communication with PRS operators in the Process Building. It is not clear how the cameras will aid the VWMS operators unless the monitors will be installed on top of the silo near the vacuum wands. The text should be revised to clarify the procedures for VWMS operation.